

Exhibit G

December 12, 2023 Email

Schy, Levi R.

From: Cohen, Jonathan Z. <jcohen@ClarkHill.com>
Sent: Tuesday, December 12, 2023 6:00 PM
To: Richards, Joshua W. B.
Cc: Schy, Levi R.; Joseph McCool (JMcCool@mmwr.com); Kevin Siegel (kevin@kmslawgroup.com); Hamill, Patricia
Subject: RE: Doe v. Haverford College et al.

Dear Josh,

At this time, we do not believe that a meet-and-confer session is necessary. Subject to and without waiver of the objections made by Plaintiff's parents, they do intend to produce a limited number of documents that are responsive to the subpoenas. The deadline provided on the subpoenas to respond is December 22, 2023. After that time, we can reassess whether a meet-and-confer session is appropriate.

While I refer you to our objections for a full statement of the problems with the subpoenas, I will detail a couple of significant ones now:

First, the overwhelming majority of the documents requested by the subpoenas—especially the request for “[a]ll communications by and between [Plaintiff's parents] and Patricia Hamill...or any individual employed by Patricia Hamill's law firm(s)” —are protected by the attorney-client privilege and the work-product doctrine, and we do not intend to produce them. Plaintiff's parents are clients of this firm, and they are also agents of Plaintiff. Plaintiff's father is also a licensed attorney, and he has been involved in the legal work and strategy on this matter since he first learned about his son being separated from the team. Plaintiffs' parents do not intend to produce privileged documents.

Second, Plaintiff's parents do not intend to produce documents that are already in Haverford's possession, such as “Documents relating or referring to the assessment and payment of Plaintiff's tuition.” There is no reason to burden third parties by seeking documents from them that you already have. Some of these are also nearly identical to requests you have made of Plaintiff.

Hopefully, the Court will not need to intervene on the propriety of the subpoenas. But if that becomes necessary, we wanted to remind you that “[a] party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena” and that the court “must enforce this duty....” Fed. R. Civ. P. 45(d)(1).

Thank you,
Jonathan

Jonathan Z. Cohen

Senior Attorney

Clark Hill

Two Commerce Square, 2001 Market Street, Suite 2620, Philadelphia, PA 19103

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From: Cohen, Jonathan Z. <jcohen@ClarkHill.com>
Sent: Monday, December 11, 2023 1:51 PM
To: Richards, Joshua W. B. <Joshua.Richards@saul.com>; Schy, Levi R. <levi.schy@saul.com>
Cc: Joseph McCool (JMcCool@mmwr.com) <JMcCool@mmwr.com>; Kevin Siegel (kevin@kmslawgroup.com)

<kevin@kmslawgroup.com>; Hamill, Patricia <phamill@ClarkHill.com>

Subject: Re: Doe v. Haverford College et al.

Josh,

I'm acknowledging your emails below. I will have a response to you by the end of the day tomorrow.

Thank you,
Jonathan

Jonathan Z. Cohen

Senior Attorney

Clark Hill

Two Commerce Square, 2001 Market Street, Suite 2620, Philadelphia, PA 19103

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From: Richards, Joshua W. B. <Joshua.Richards@saul.com>

Sent: Monday, December 11, 2023 12:32:05 PM

To: Cohen, Jonathan Z. <jcohen@ClarkHill.com>; Schy, Levi R. <levi.schy@saul.com>

Cc: Joseph McCool (JMcCool@mmwr.com) <JMcCool@mmwr.com>; Kevin Siegel (kevin@kmslawgroup.com)

<kevin@kmslawgroup.com>; Hamill, Patricia <phamill@ClarkHill.com>

Subject: RE: Doe v. Haverford College et al.

[External Message]

Jonathan,

I'm follow up on the below. If we don't hear back from you relatively soon, we're going to move forward with motions practice.

Thanks very much,

Joshua W. B. Richards

Partner

Pronouns: He/him/his

SAUL EWING LLP | Philadelphia

Office: (215) 972-7737 **Cell:** (917) 679-5223

From: Richards, Joshua W. B.

Sent: Thursday, December 7, 2023 8:29 PM

To: Cohen, Jonathan Z. <jcohen@ClarkHill.com>; Schy, Levi R. <levi.schy@saul.com>

Cc: Joseph McCool (JMcCool@mmwr.com) <JMcCool@mmwr.com>; Kevin Siegel (kevin@kmslawgroup.com)

<kevin@kmslawgroup.com>; Hamill, Patricia <phamill@ClarkHill.com>

Subject: RE: Doe v. Haverford College et al.

Jonathan,

Could you please advise whether a meet and confer makes sense with respect to the production of documents in response to his subpoena? I note that your objections express no intent to provide documents in response to any of the

categories requested (and you make a location-based objection to a subpoena you accepted service for and which requests electronic production).

I am happy to meet, and have good availability on the 13th, but don't want to unnecessarily take up everyone's time if your position is that [REDACTED] parents have no obligations to produce documents in response to these subpoenas, in which case we can bring the issue directly to the judge.

Thanks very much,

Joshua W. B. Richards

Partner

Pronouns: He/him/his

SAUL EWING LLP | Philadelphia

Office: (215) 972-7737 **Cell:** (917) 679-5223

From: Cohen, Jonathan Z. <jcohen@ClarkHill.com>

Sent: Wednesday, December 6, 2023 4:59 PM

To: Richards, Joshua W. B. <Joshua.Richards@saul.com>; Schy, Levi R. <levi.schy@saul.com>

Cc: Joseph McCool (JMcCool@mmwr.com) <JMcCool@mmwr.com>; Kevin Siegel (kevin@kmslawgroup.com) <kevin@kmslawgroup.com>; Hamill, Patricia <phamill@ClarkHill.com>

Subject: Doe v. Haverford College et al.

****EXTERNAL EMAIL** - This message originates from outside our Firm. Please consider carefully before responding or clicking links/attachments.**

Josh and Levi,

Attached please find objections to the November 22, 2023 subpoenas issued to Non-Parties Robert Doe and Jane Doe, Plaintiff's parents.

Thank you,
Jonathan

Jonathan Z. Cohen

Senior Attorney

Clark Hill

Two Commerce Square, 2001 Market Street, Suite 2620, Philadelphia, PA 19103

+1 215.422.4426 (office) | +1 215.901.7521 (cell) | +1 215.640.8501 (fax)

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"Saul Ewing LLP (saul.com)" has made the following annotations:

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